

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

JANE DOE #1, et al.	)	CASE NO. 1:20-CV-00467
	)	
Plaintiffs	)	JUDGE
	)	
v.	)	
	)	
OHIO UNIVERSITY, et al.	)	
	)	<u>DEFENDANT AMIR MILLER'S</u>
Defendants	)	<u>ANSWER</u>
	)	

Amir Miller (“Defendant” or “Miller”) by and through undersigned counsel, submits the following as his Answer to the Plaintiffs’ Complaint:

1. Defendant admits that Jane Doe #1 is a student at Ohio University, and lacks sufficient knowledge to admit or deny the other allegations in paragraph 1 of the complaint.
2. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 2 of the complaint.
3. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 3 of the complaint.
4. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 4 of the complaint.
5. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 5 of the complaint.
6. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 6 of the complaint.

7. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 7 of the complaint.

8. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 8 of the complaint.

9. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 9 of the complaint.

10. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 10 of the complaint.

11. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 11 of the complaint.

12. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 12 of the complaint.

13. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 13 of the complaint.

14. Defendant admits that he is a student at Ohio University and a permanent resident of Cuyahoga County, but denies the other allegations in paragraph 14 of the complaint.

15. Paragraph 15 of the complaint does not require a response.

16. Defendant admits that he and Jane Doe #1 were in a two-year romantic relationship, admits that during that relationship he engaged in a pattern of conduct that constituted menacing by stalking (Ohio Revised Code 2903.211), and denies the other allegations in paragraph 16 of the complaint.

17. Defendant admits that the conduct admitted to in the previous paragraph occurred as stated in paragraph 17 of the complaint.

18. Defendant denies the allegations in paragraph 18 of the complaint.
19. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 19 of the complaint.
20. Paragraph 20 of the complaint does not require a response.
21. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 21 of the complaint.
22. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 22 of the complaint.
23. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 23 of the complaint.
24. Defendant admits to engaging in conduct that constituted menacing by stalking (Ohio Revised Code 2903.211), and denies the other allegations in paragraph 24 of the complaint.
25. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 25 of the complaint.
26. Defendant admits that he was prosecuted, denies that he was convicted, and lacks sufficient knowledge to admit or deny the remaining allegations in paragraph 26 of the complaint.
27. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 27 of the complaint.
28. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 28 of the complaint.
29. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 29 of the complaint.

30. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 30 of the complaint.

31. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 31 of the complaint.

32. Paragraph 32 of the complaint does not require a response.

33. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 33 of the complaint.

34. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 34 of the complaint.

35. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 35 of the complaint.

36. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 36 of the complaint.

37. Defendant denies sexual abuse, and lacks sufficient knowledge to admit or deny the remaining allegations in paragraph 37 of the complaint.

38. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 38 of the complaint.

39. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 39 of the complaint.

40. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 40 of the complaint.

41. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 41 of the complaint.

42. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 42 of the complaint.

43. Paragraph 43 of the complaint does not require a response.

44. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 44 of the complaint.

45. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 45 of the complaint.

46. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 46 of the complaint.

47. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 47 of the complaint.

48. Defendant denies sexual abuse, and lacks sufficient knowledge to admit or deny the remaining allegations in paragraph 48 of the complaint.

49. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 49 of the complaint.

50. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 50 of the complaint.

51. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 51 of the complaint.

52. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 52 of the complaint.

53. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 53 of the complaint.

- 54. Paragraph 54 of the complaint does not require a response.
- 55. Defendant denies the allegations against him in paragraph 55 of the complaint.
- 56. Defendant denies the allegations against him in paragraph 56 of the complaint.
- 57. Defendant denies the allegations against him in paragraph 57 of the complaint.
- 58. Paragraph 58 of the complaint does not require a response.
- 59. Defendant denies the allegations against him in paragraph 59 of the complaint.
- 60. Defendant denies the allegations against him in paragraph 60 of the complaint.
- 61. Defendant denies the allegations against him in paragraph 61 of the complaint.
- 62. Paragraph 62 of the complaint does not require a response.
- 63. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 63 of the complaint.
- 64. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 64 of the complaint.
- 65. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 65 of the complaint.
- 66. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 66 of the complaint.
- 67. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 67 of the complaint.
- 68. Paragraph 68 of the complaint does not require a response.
- 69. Defendant denies the allegations in paragraph 69 of the complaint.
- 70. Defendant denies the allegations in paragraph 70 of the complaint.

/s/ Fernando O. Mack

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CERTIFICATE OF SERVICE

This Answer was filed via the Court's Electronic Filing System on March 21, 2020;  
notice will be provided to all parties by operation of the system.

/s/ Fernando O. Mack  
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